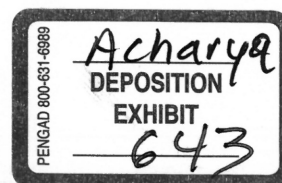


GHAJAR EXHIBIT 27

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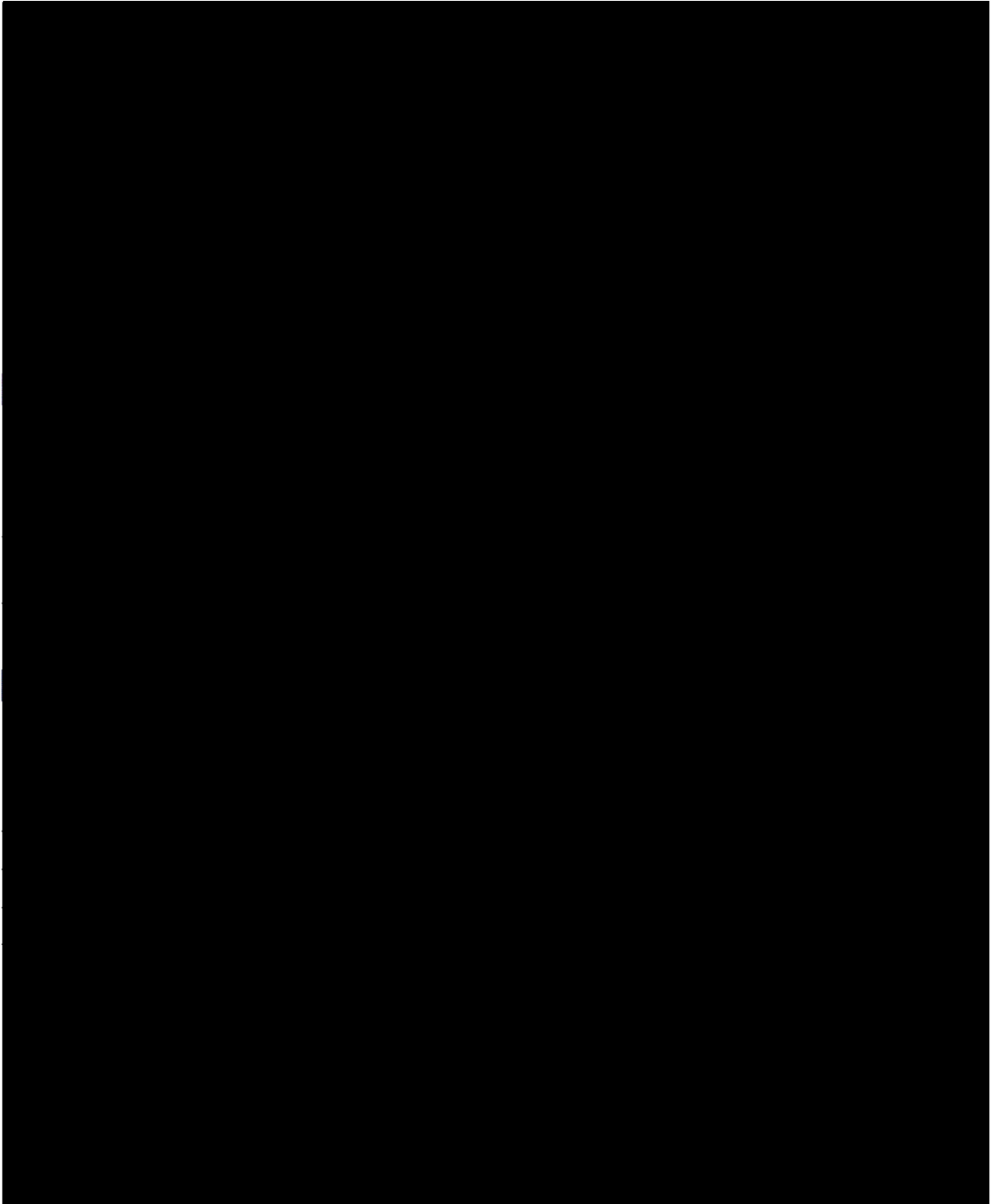
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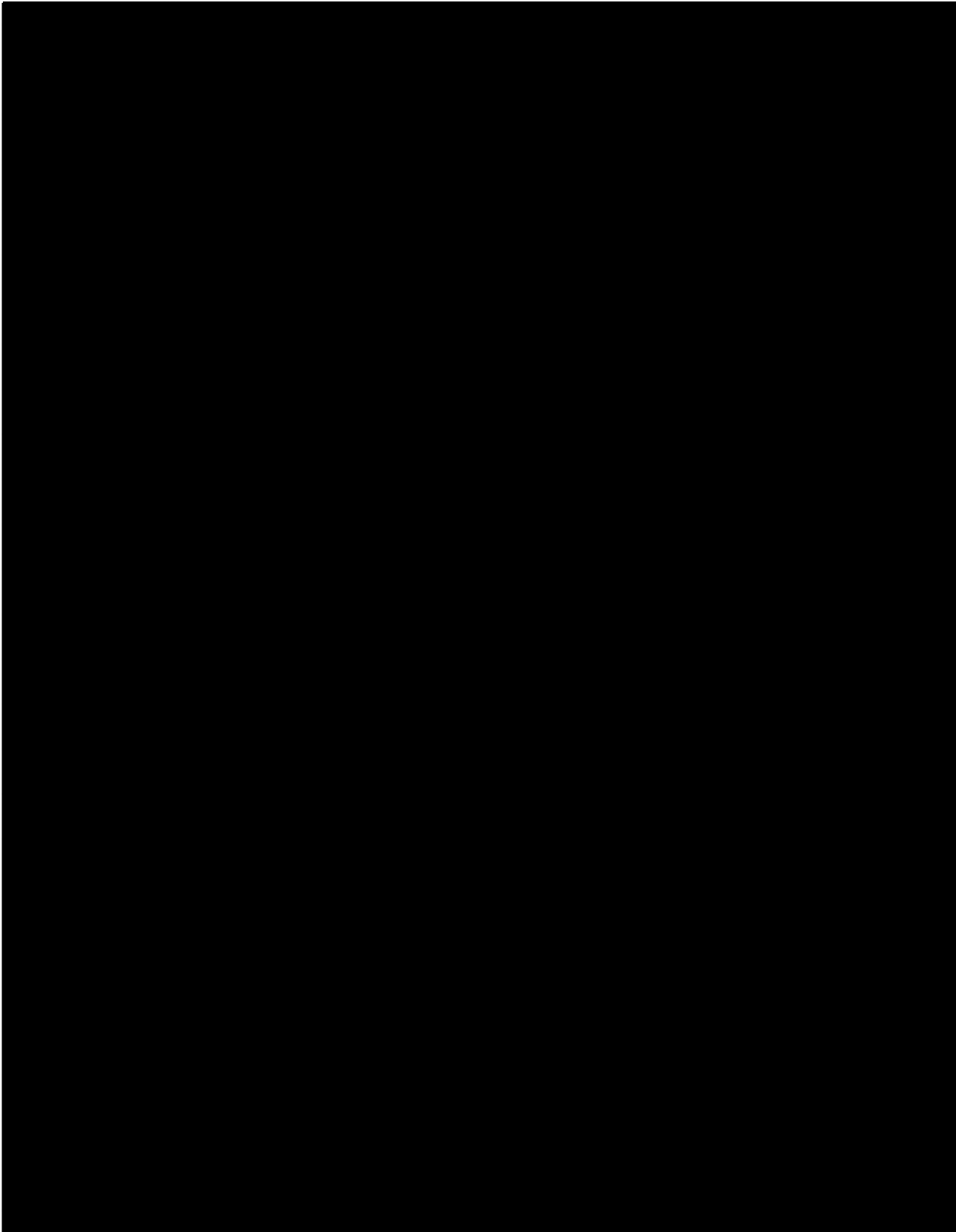


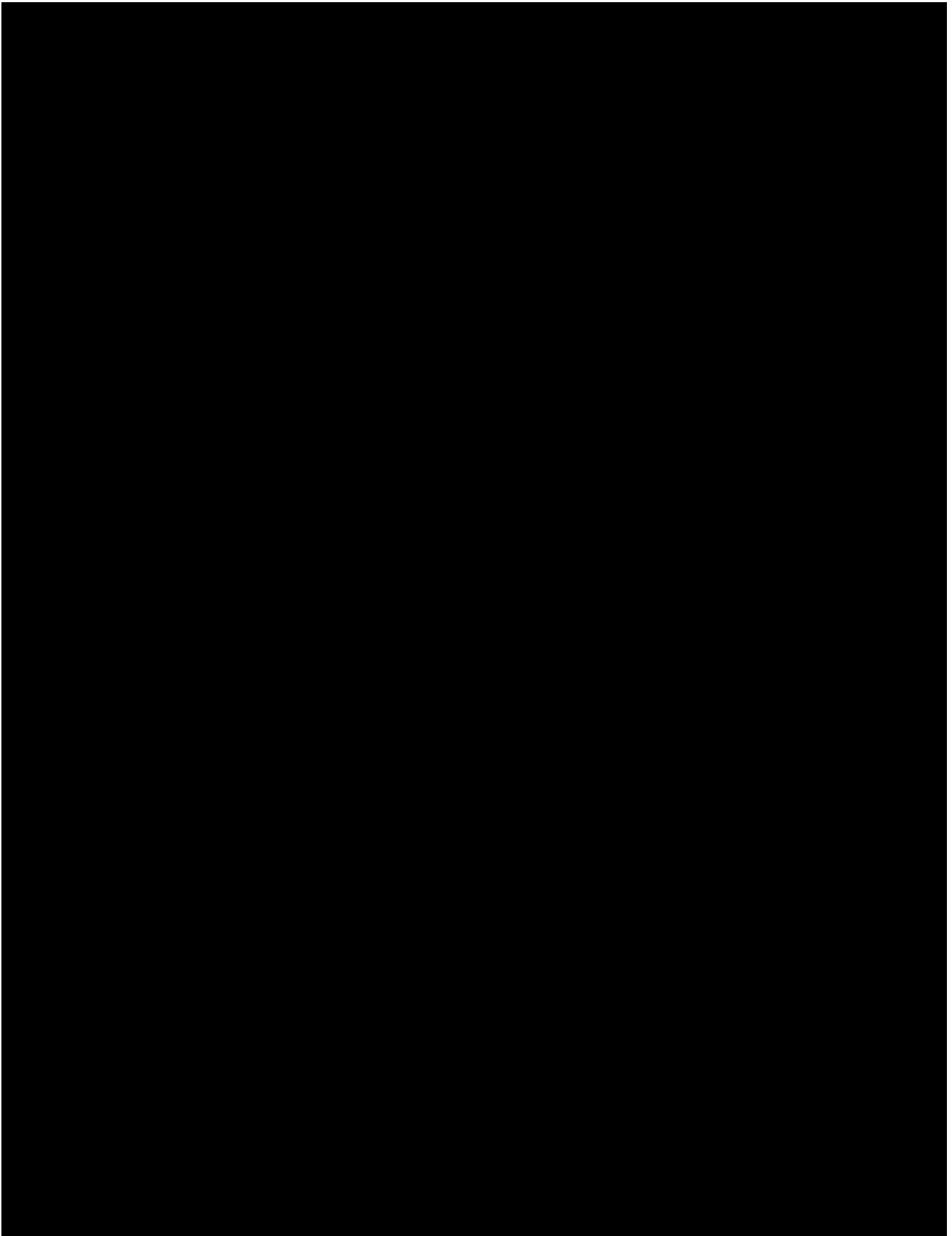
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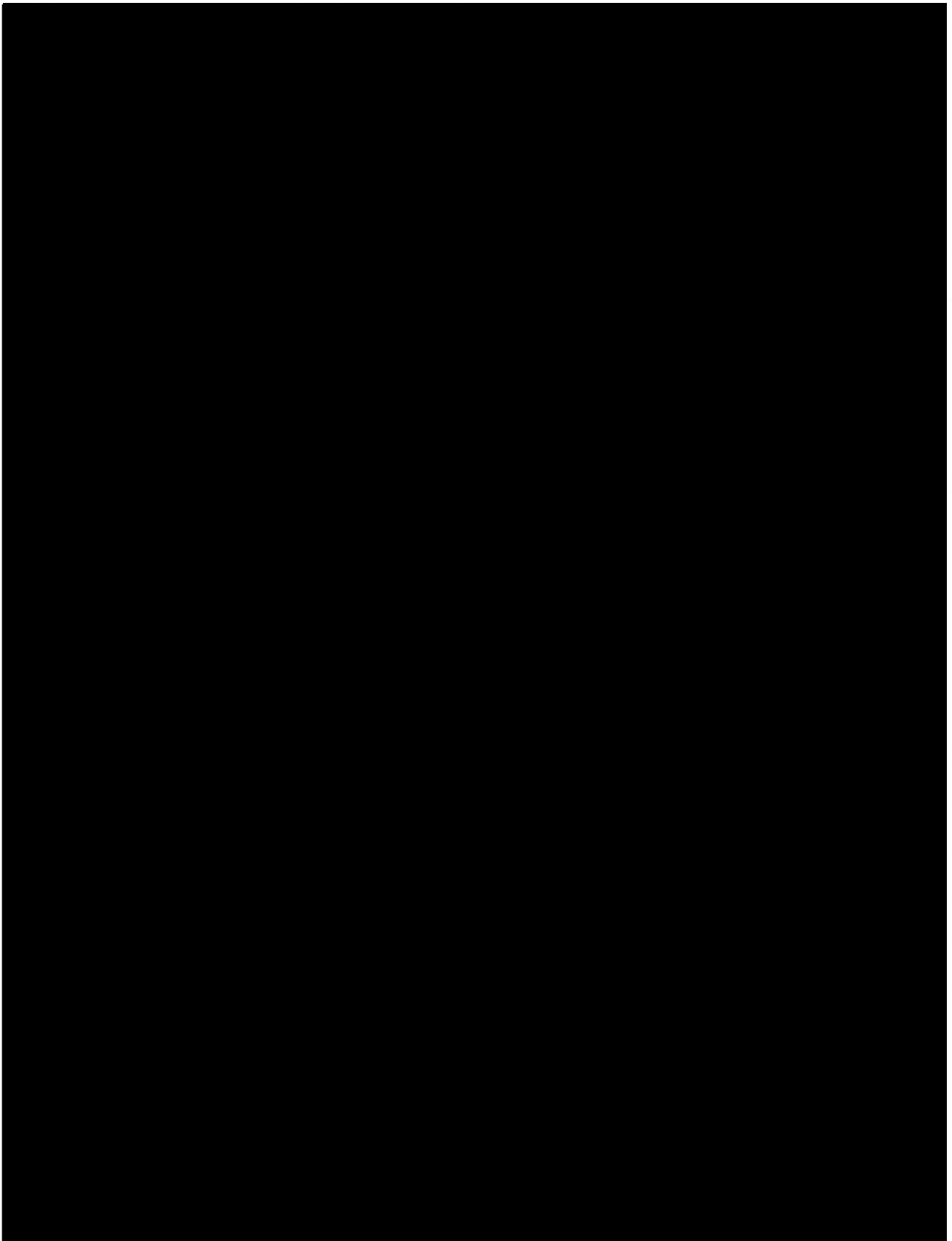
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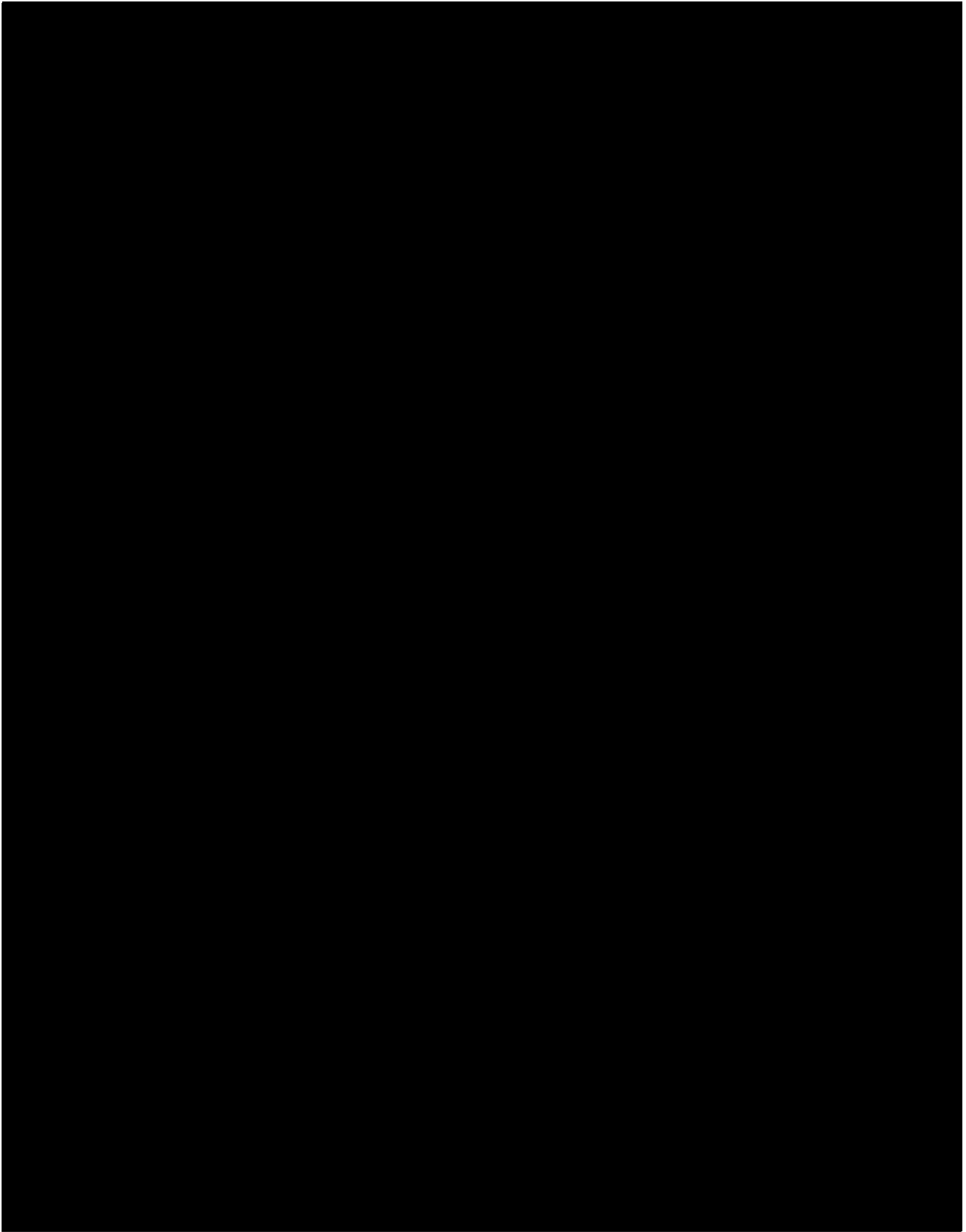
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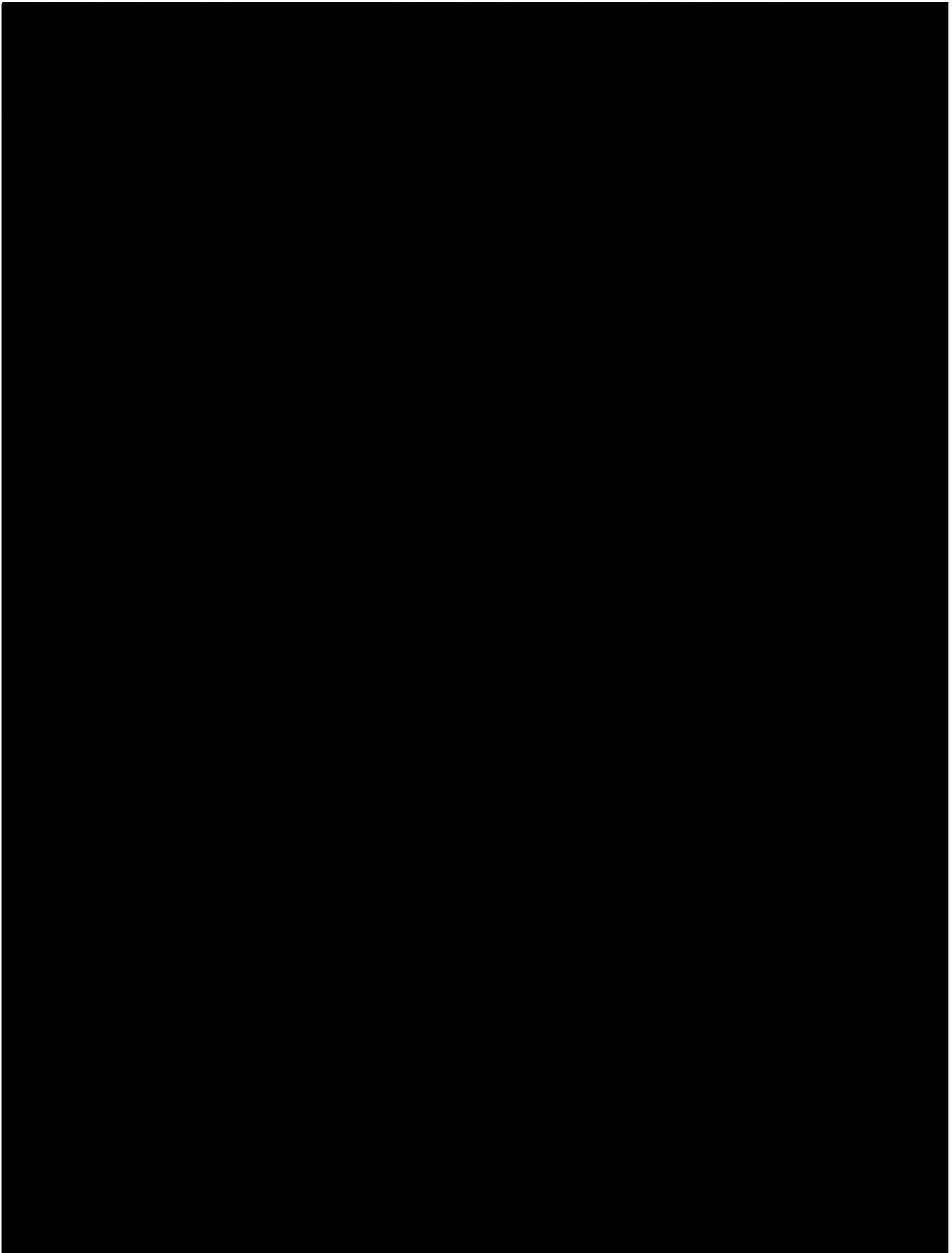


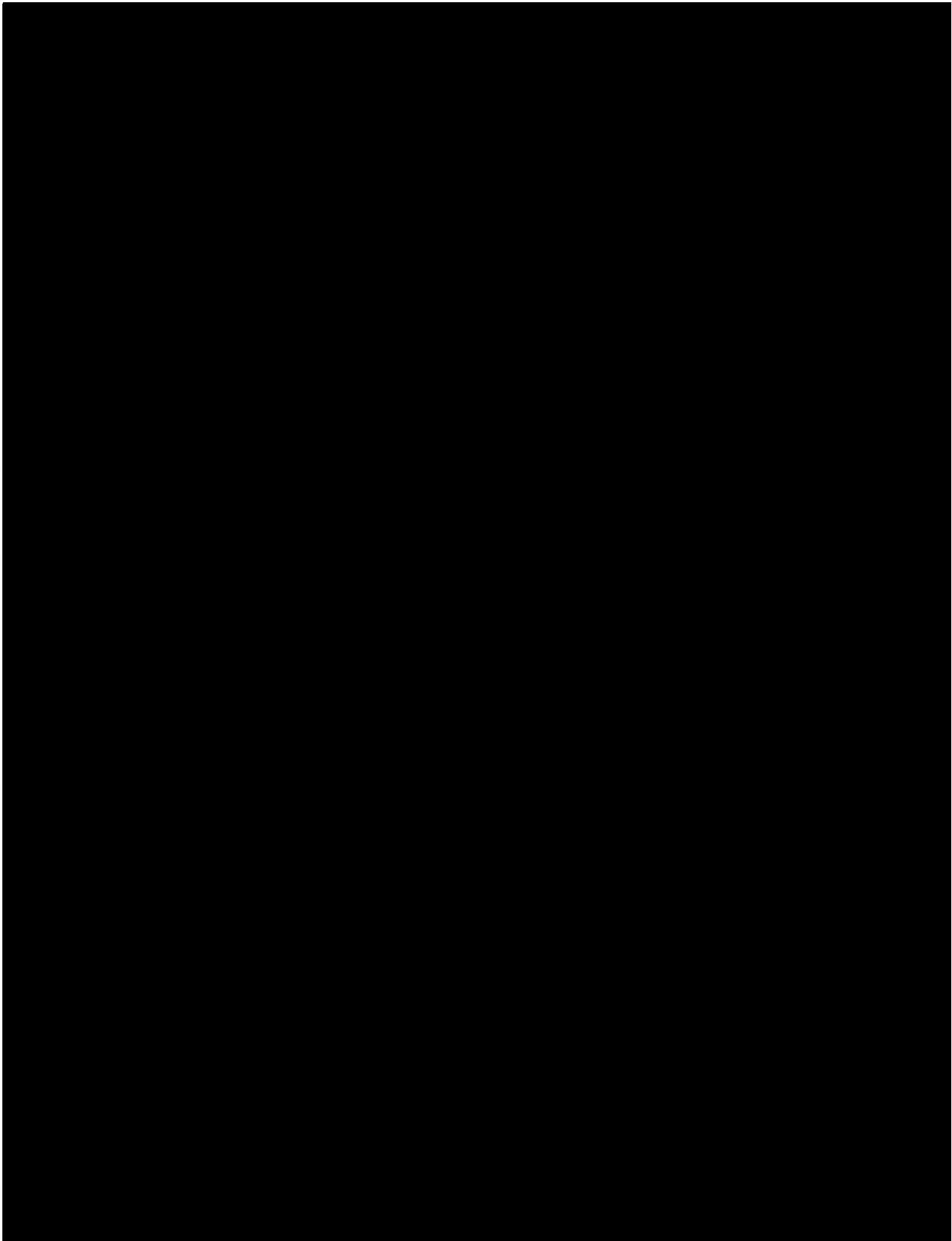


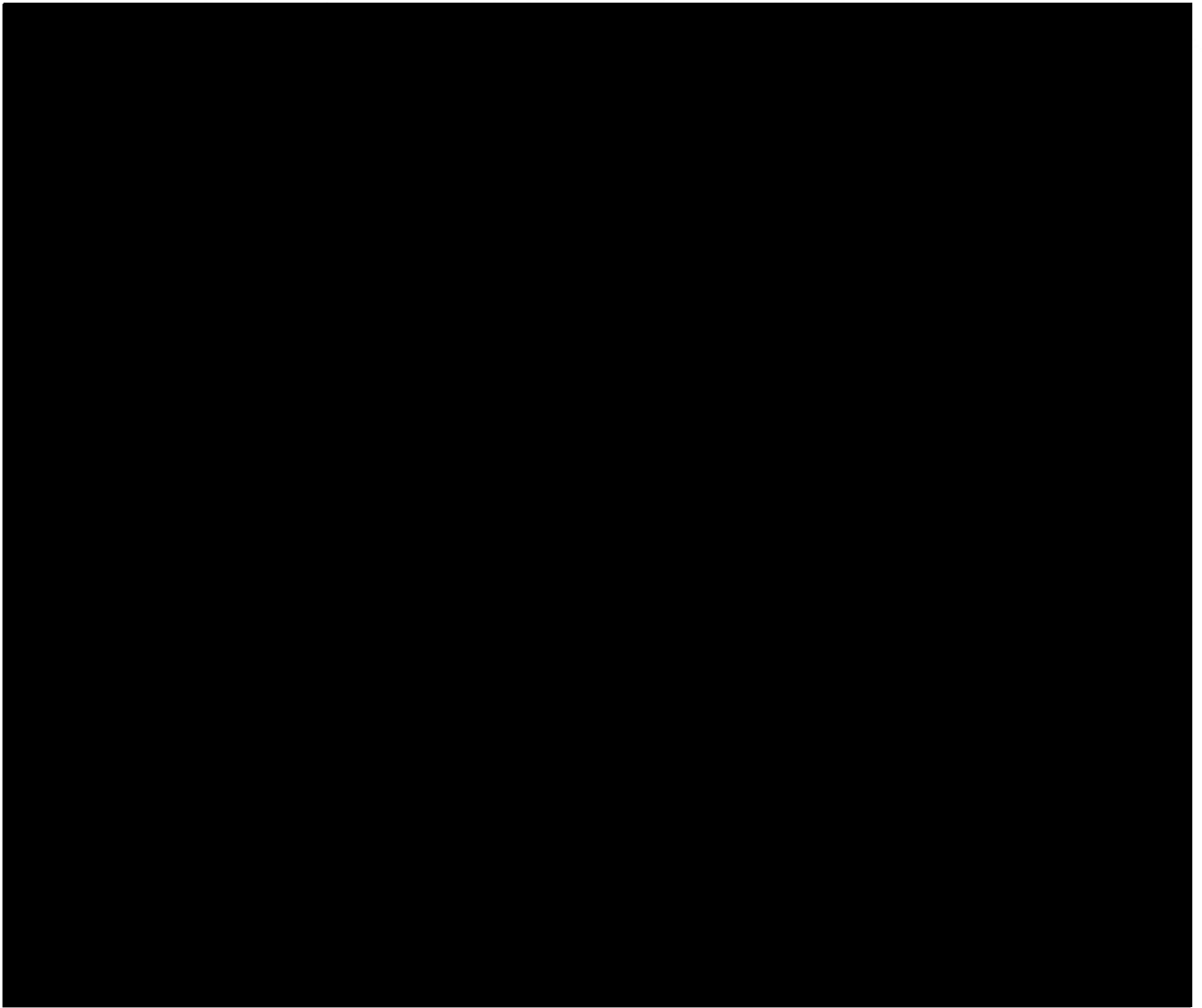












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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

RICHARD KADREY, ET AL.,)
)
INDIVIDUAL AND REPRESENTATIVE)
PLAINTIFFS,) LEAD CASE NO.
v.) 3:23-cv-03417-VC
)
META PLATFORMS, INC.,)
)
DEFENDANT.)

)

* H I G H L Y C O N F I D E N T I A L *
* A T T O R N E Y S ' E Y E S O N L Y *

VIDEO-RECORDED DEPOSITION OF AMRISH ACHARYA
VOLUME I
THURSDAY, NOVEMBER 21, 2024
SAN FRANCISCO, CALIFORNIA
9:29 A.M. PST

REPORTED BY AUDRA E. CRAMER, CSR NO. 9901

DIGITAL EVIDENCE GROUP
1730 M. Street, NW, Suite 812
Washington, D.C. 20036
(202) 232-0646

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1 revenue projections related to generative AI?

2 A. Yes.

3 MR. MORTON: Object to the...

4 BY MR. STEIN:

5 Q. And what were those discussions?

6 A. So in the second quarter of 2024, which
7 was, you know, through April, May and -- April
8 and May, generally, of this year, we were amidst
9 a long-range planning exercise, as we do every
10 year. As part of that long-range planning
11 exercise, generative AI was a topic that we
12 built a long-range plan for, and as part of that
13 long-range plan for generative AI, we had
14 revenue -- our, you know, revenue estimates in
15 the long term.

16 MR. STEIN: Mark this as Exhibit 643.

17 (Whereupon, Exhibit 643 was
18 marked for identification.)

19 BY MR. STEIN:

20 Q. Do you have Exhibit 643 in front of
21 you, Mr. Acharya?

22 A. I do.

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1 Q. And is this that long-range plan that
2 you just mentioned?

3 A. This document speaks to that revenue
4 outlook -- long-range revenue outlook from GenAI
5 to Meta, yes.

6 Q. And did you prepare this document?

7 A. I did not prepare this document in
8 full, but I was -- I reviewed and was
9 responsible for some portions of this document.

10 Q. Who else prepared this document with
11 you?

12 A. So depending on the specific revenue
13 opportunity, there were different teams that
14 worked on this. In general, this was a
15 combination of teams across finance, across
16 teams that included GenAI itself, across our
17 monetization team, with significant input from
18 other leaders across the company, including our
19 CFO, Susan Li, our chief products officer, Chris
20 Cox, and our CEO, Mark Zuckerberg.

21 Q. Do you understand Mark Zuckerberg to
22 have reviewed this document?

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1 MR. MORTON: Objection. Form.

2 THE WITNESS: Yes, I do.

3 BY MR. STEIN:

4 Q. And how about Chris Cox?

5 A. I do believe Chris also has reviewed
6 and reviewed this document.

7 Q. And how about Susan Li?

8 A. Also.

9 Q. Could you turn the first page after the
10 metadata, which is Bates stamp 89020, please.

11 A. Yes.

12 Q. There's a table here that is called
13 "GenAI Wins Case" in (b).

14 Do you see that?

15 A. Yes.

16 Q. And what does that title mean to you?

17 A. So that title is the name of a scenario
18 that we have laid out in this document for
19 GenAI's revenues and total returns through 2035.

20 Q. And all the way at the bottom right
21 under the year 2035, there's a number related to
22 GenAI- driven return.

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1 Do you see that number?

2 A. I do.

3 Q. And what is that number?

4 A. So in the first table, the "GenAI Wins
5 Case," that number is [REDACTED]

6 Q. Why is that number so far from the
7 [REDACTED] number that we discussed earlier?

8 A. I was recollecting the base case rather
9 than the "GenAI Wins" case as part of my -- the
10 numbers that I shared with you. If you look at
11 the base-case revenue numbers, that's
12 [REDACTED] in 2035.

13 Q. At the time you gave your answer, did
14 you know that there was a "Wins" case that was
15 also projected?

16 A. Yes. I knew there were two scenarios
17 that were projected.

18 Q. Okay. Any reason why you didn't
19 mention the "Wins" case earlier?

20 A. Normally when we -- when we load or
21 forecast for expenses in the context of budget,
22 we use, like, one case, which is a 50/50 case.

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1 That's typically our base case, so those are the
2 numbers that we typically share. And when we
3 talk about things in terms of expenses.

4 But this is an optimistic case. The
5 "GenAI Wins" case is not a 50/50 case. It's an
6 optimistic case. But other than that, there is
7 no specific reason that I did not mention.

8 Q. The first paragraph here mentions that
9 this was discussed with Mark Zuckerberg -- or at
10 least the issues in this document were discussed
11 with Mark Zuckerberg on April 30 of this year;
12 is that right?

13 A. Correct.

14 Q. And what does it say had happened since
15 that meeting?

16 A. It says that our base GenAI opportunity
17 has, in aggregate, increased by greater than [REDACTED]
18 from [REDACTED] of the "GenAI Wins" case to
19 [REDACTED] currently.

20 Q. And do you know if that increase in the
21 base scenario changed the metrics for the "Wins"
22 case scenario?

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1 STATE OF CALIFORNIA)
2 COUNTY OF LOS ANGELES) SS.

3

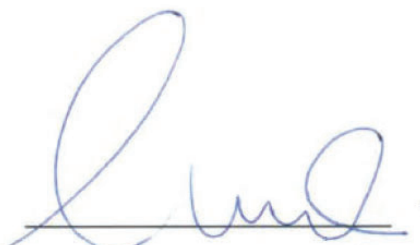
4 I, AUDRA E. CRAMER, CSR No. 9901, in and for the
5 State of California, do hereby certify:

6 That, prior to being examined, the witness named
7 in the foregoing deposition was by me duly sworn to
8 testify the truth, the whole truth and nothing but the
9 truth;

10 That said deposition was taken down by me in
11 shorthand at the time and place therein named, and
12 thereafter reduced to typewriting under my direction,
13 and the same is a true, correct and complete transcript
14 of said proceedings;

15 I further certify that I am not interested in the
16 event of the action.

17 Witness my hand this 21st day of November,
18 2024.



Certified Shorthand
Reporter for the
State of California

22